

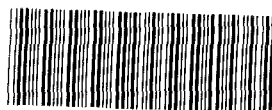
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United States Government

Department of Energy

memorandum



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DATE: JUL 12 1990

REPLY TO
ATTN OF: EH-25

SUBJECT: Review of the Rocky Flats Plant Operable Unit 2 (903 Pad, Mound, and East Trenches) Surface Water Interim Remedial Action Plan/Environmental Assessment (IRAP/EA)

TO:

David P. Simonson
Acting Assistant Manager
for Environmental Management

As requested by your memorandum dated June 15, 1990, the Office of NEPA Oversight has reviewed the subject draft IRAP/EA, which is dated June 12, 1990, and which was received in this office on June 18, 1990, for adequacy as a National Environmental Policy Act (NEPA) document.

Based on my staff's review, the scope and level of environmental analysis integrated into this document is appropriate; this document is generally adequate as an EA. Attached are general and specific comments and questions which are intended to improve the quality of the document.

Because of the time sensitivity of the proposed action, we recommend that you prepare a draft finding of no significant impact (FONSI) for our advanced review so that we can prepare for the formal request for approval of the EA and issuance of the FONSI from EM-1.

We look forward to assisting you in completing this action. If you have any questions, please contact Mr. Eric Cohen of my staff at FTS 896-7684.

Carol Borgstrom

Carol M. Borgstrom
Director
Office of NEPA Oversight

cc: R. Scott, EM-20
J. Sands, EM-442 (w/atch)
S. Miller, GC-11
R. Schassburger, RFO (w/atch)
R. Quinn, EH-22

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ADMIN REPLY

6-0002-00002

General Comments--Operable Unit 2 IRAP/EA

The discussion of terrestrial impacts in section 7.3 indicates that the proposed action could potentially impact some or all of the 1000 feet of linear wetlands due to removal of water from one segment of this habitat. The text indicates that the required consultation with the Corps of Engineers (COE) has been accomplished and, based on verbal communications, the COE has determined that no permit is required. We suggest that this consultation be documented. Is this the spring of 1988 consultation with both COE and the U.S. Fish and Wildlife Service to delineate wetlands which is discussed in section 2.2.6? Please clarify whether or not any mitigation measures, such as erosion control or creation of compensatory wetland areas would be required. If such mitigation is required, a mitigation plan may be necessary. Also, please indicate whether the loss of flow attenuation provided by these wetlands would be likely to result in a substantial impact on downstream water quality, such as suspended solids at the NPDES discharge location(s).

The discussion in section 7 of the Environmental Effects of the Proposed Action and Alternatives adequately assesses the primary exposure pathway (airborne), but does not specifically state whether other pathways, such as water consumption, would be important.

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Specific Comments

P. 7-3, paragraph 4: The effluent from the water treatment units will contain VOC's and radionuclides at a low concentration level. Identification of these levels, if possible, would provide additional support for lack of consideration of the drinking water pathway in the impact analysis.

Sections 7.5.1, 7.5.2 and 7.5.3 Airborne Exposures: Given the EA statements that the Mound, Oil Burn Pit, Trench T-1 and Woman Creek sites have been contaminated by wind entrained plutonium, the text should explain why wind entrainment of contaminated soil is not considered in the radiological impact analyses for normal operations.

P. 7-11, paragraph 2: The text implies that, since the EPA does not list an inhalation reference dose for phthalates, it is not necessary to consider impacts of release of these compounds. It is preferable to present a substantive reason for lack of analysis of impacts of exposure to phthalates.

P. 7-11, paragraph 5: The text should explain why dust from truck wakes does not constitute an exposure path for non-driver remediation project workers during normal operations. The explanation should be consistent with the inclusion of this pathway in the impact analysis for non-project site employees (EA, p. 7-13) and members of the public (EA, p. 7-14).

P. 7-12, paragraph 4: The text implies that an estimated dust generation rate, in combination with a dispersion model, was used to project construction phase impacts at an on-site guard post. The text also states that the approach used to estimate airborne contamination levels was the same as in Section 7.5.1. Section 7.5.1 states that an assumed dust loading (i.e., the OSHA limit) was used to estimate impacts. The text should be revised to eliminate the apparent inconsistency.

Additional comments and questions are contained in the margins of the attached pages from the draft IRAP/EA.

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